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August 13, 2018

by email

**PERSONAL & CONFIDENTIAL  
DOCUMENT PROTECTED BY  
ATTORNEY CLIENT PRIVILEGE**

Ms. Olga Lydia Mireles  
2705 Oaks Dr.  
Pasadena, TX 77502

RE: Claims against CenterPoint Energy

Dear Ms. Mireles,

Approximately a month ago I sent a formal legal demand and offer of pre-litigation to Ms. Katherine Flanagan, outside counsel for CenterPoint Energy. This formal demand offered to proceed to mediation before a mediator acceptable to the parties.

I have since spoken with Ms. Flanagan and with additional counsel for CenterPoint, Ms. Kelley Edwards. Despite the formal legal demand and offer to proceed to mediation I have not been able to obtain an agreement to proceed to mediation.

We can proceed to mediation only when the parties agree to mediate or when the court orders mediation.

In view of the above, and because I do not expect CenterPoint to change its position on mediation, I recommend that we file suit seeking a court order directing the parties to proceed to mediation.

Accordingly I have prepared the enclosed lawsuit for filing in Harris County District Court. If you agree with my recommendations, please sign the enclosed lawsuit and return it to me with the attorney fee shown below. I will then file suit and proceed with action.

\*Please address all correspondence to 336 Rim Rock Road, Kerrville, Texas 78028



**Amendment to Original charge of Discrimination (Charge No. 460-2016-03477, Mireles v. CenterPoint Energy Corporation**

**(Supporting statement of charging party)**

I was hired by defendant as a full time employee and performed the duties of my position capably and effectively. At all times during my employment, I was a good, competent, dependable and loyal employee. At all times relevant to this action I was experienced and accomplished my employer's industry. My employer commenced and continued a course of discrimination against me on account of my race, ~~African~~ Mexican American. In response to my employer's action I duly and timely filed a charge of discrimination with the Equal Employment Opportunity Commission and by reference with the Texas Workforce Commission.

Thereafter my employer commenced and continued a course of retaliation against me for asserting claims of discrimination. Specifically my employer's retaliation consisted in part and without limitation in treating me less favorably than persons outside my protected categories. The actions by my employer are particularly described below.

During my employment and after asserting claims of discrimination under Title VII of the Civil Rights Act of 1964, my employer intentionally commenced and carried out a course of conduct which inflicted emotional distress upon me on account of my race, ~~Mexican~~ African American. These claims are based upon the following described actions by my employer:

- a. It intentionally subjected me to abusive working conditions which were calculated to have the effect and which did have the effect of inflicting emotional distress upon me.
- b. It placed arbitrary and capricious goals or quotas for me to attain with the intent to force me from my job for pretextual reasons.
- c. It intentionally subjected me to abusive working conditions by requiring me to perform my required work duties under circumstances and under a supervisor who uttered maliciously and belittling statements to me on account of my race and my gender, female.
- d. All the above actions by my employer amounted to discrimination against me or harassment of me account of my gender female, and/or my race ~~Mexican~~ African American all in violation of Title VII of the Civil Rights Act of 1964, as amended. and Tex. Labor Code

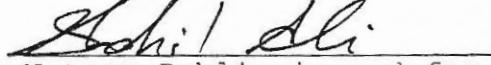
Ann. Sec. 21.001 et seq.

e. My employer, acting through its officials and supervisory personnel, commenced and continued a practice of repeated, unwelcome and uninvited offensive abusive conduct toward me on account of my gender female, and my race, ~~Mexican~~ American, all of which constituted discrimination against me on account of my gender, female and my race ~~Mexican~~ American.

The actions by my employer following my filing of a charge of discrimination with the Equal Employment Opportunity Commission also constituted retaliation against me in violation of Title VII of the Civil Rights Act of 1964.

  
Olga Lydia Mireles

Subscribed and sworn to before me this 19<sup>th</sup> day of October,  
2018.

  
Shohil Ali  
Notary Public in and for  
the State of Texas

